

STATE OF VERMONT

SUPERIOR COURT
CHITTENDEN UNIT

CIVIL DIVISION
DOCKET NO. 333-4-15 Cncv

Brianne E. Chase, Trustee of the Revocable Living)
Trust of Barbara S. Eastman,)
)
Plaintiff)
)
v.)
)
Town of Underhill, et al.)
)
Defendants)

DEFENDANTS SENGERS' FIRST SET OF DISCOVERY REQUESTS

NOW COMES Defendants, the Sengers, and hereby request that Plaintiff produce the requested documents within thirty (30) days. All responses shall be made in accordance with V.R.C.P. 26, 33, and 34.

REQUESTS FOR PRODUCTION OF DOCUMENTS


Pursuant to Rule 34 of the Vermont Rules of Civil Procedure, Defendants request that Plaintiff produce the following documents for inspection and copying at the home of the Sengers within thirty (30) days of the date hereof.

Request for Production No. 1

Please produce a copy of the Revocable Living Trust of Barbara S. Eastman trust document.

THE FOREGOING REQUESTS TO PRODUCE SHOULD BE DEEMED TO BE CONTINUING IN NATURE INsofar AS REQUESTED ITEMS MAY COME INTO THE POSSESSION OF PLAINTIFF AND ITS ATTORNEYS BETWEEN THE PRESENT TIME AND THE TIME OF TRIAL.

Dated at Underhill, Vermont this 2 day of September 2016.


Stanley Senger
Pro Se

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Brianne E. Chase, Trustee of the Revocable Living)
Trust of Barbara S. Eastman,)
)
Plaintiff)
)
v.)
)
Town of Underhill, David Arnold,)
Stanley and Sue Senger, and Carl and)
Carol Menard,)
)
Defendants)

DISCOVERY CERTIFICATE

I, Stanley Senger, hereby certify that on the 2 day of September, 2016, I sent a copy of Defendants' First Set of Requests for Production of Documents to Plaintiff via U.S. mail, postage prepaid to:

Elizabeth M. Demas, Esq.
Clarke Demas & Baker
346 Shelburne Road, Suite 203
P.O. Box 4484
Burlington, VT 05406-4484


With copies to:

Murphy Sullivan Kronk

Carl and Carol Menard

David Arnold

DATED at Underhill, Vermont this 2 day of September, 2016.


Stanley Senger
Pro Se